

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:                                 :             CHAPTER 13  
  :             :  
Marquita Kirk                       :             NO. 21-11771-MDC  
  :             :

MOTION TO APPROVE SECONDARY LOAN MODIFICATION

Debtor, by her attorney, David M. Offen, respectfully request this Honorable Court to Approve Secondary Loan Modification and in support state the following:

1. Debtor filed the above captioned Chapter 13 Petition for Relief on June 24, 2021.

2. After negotiations, PennyMac Loan Services, Inc. has agreed to give the Debtor a secondary loan modification on Debtor's home located at 8435 Williams Avenue, Philadelphia, PA 19150.

3. One of the conditions for giving this secondary loan modification is that the approval of the Chapter 13 Trustee or the court must be obtained by the Debtor.

4. The incurring of the secondary loan modification will be beneficial to all parties in this case in that it will permit the Chapter 13 case to proceed without the Debtor facing the threat of a motion for relief.

5. The mortgage company is offering the Debtor a lower mortgage rate. The secondary loan modification is in the amount total of \$6,568.65 over a period of thirty (30) years.

6. The secondary loan modification will also provide for covering of the Debtor's mortgage arrearage, therefore allowing

for the plan to be modified and for the unsecured creditors to receive some payments.

WHEREFORE, Debtor, by Attorney David M. Offen, respectfully request this Honorable Court enter an Order approving the secondary loan modification on the premises located at 8435 Williams Avenue, Philadelphia, PA 19150, and for such further relief as is just and proper.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor  
The Curtis Center  
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Dated: 09/06/2023